

Message

Sent: 12/10/2018 3:06:35 PM
To: Wall, Mary Peyton [wallmp@dhec.sc.gov]
Subject: Draft Comments 2017 End of Year
Attachments: EPA Comments_SC 2017 End of Year Revisions_Version 2_DRAFT.DOCX

Hi Mary Peyton,

Here are the draft comments for South Carolina's removal of CAIR/re-adoption of NOx SIP Call regulations as forwarded in the official prehearing submittal on 11/9/2018.

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Bailey, Ashten [no-reply@sharepointonline.com]
Sent: 7/26/2018 9:11:34 PM
To: Hogan, Stephanie [Hogan.Stephanie@epa.gov]; Murray, Beth [Murray.Beth@epa.gov]; Akers, Brad [Akers.Brad@epa.gov]; Benjamin, Lynorae [benjamin.lynorae@epa.gov]; Bradley, Twunjala [Bradley.Twunjala@epa.gov]; Lifland, David [Lifland.David@epa.gov]; Sanchez, Madolyn [Sanchez.Madolyn@epa.gov]; Scofield, Steven [Scofield.Steve@epa.gov]
CC: Bailey, Ashten [Bailey.Ashten@epa.gov]
Subject: Bailey, Ashten has shared 'NOx SIP Call_CAIR removal_TPs'

Draft talking points for the monday call.

Open NOx SIP Call_CAIR removal_TPs.docx

See more related to Bailey, Ashten in Delve.



Get the SharePoint mobile app!



Message

From: Bailey, Ashten [Bailey.Ashten@epa.gov]
Sent: 3/27/2017 10:12:20 PM
To: Akers, Brad [Akers.Brad@epa.gov]; Bell, Tiereny [Bell.Tiereny@epa.gov]; Bradley, Twunjala [Bradley.Twunjala@epa.gov]; Febres, Andres [febres-martinez.andres@epa.gov]; Lakeman, Sean [Lakeman.Sean@epa.gov]; Myers, Dianna [Myers.Dianna@epa.gov]; Notarianni, Michele [Notarianni.Michele@epa.gov]; Sanchez, Madolyn [Sanchez.Madolyn@epa.gov]; Scofield, Steven [Scofield.Steve@epa.gov]; Sheckler, Kelly A. [Sheckler.Kelly@epa.gov]; Ward, Nacosta [Ward.Nacosta@epa.gov]; Wong, Richard [Wong.Richard@epa.gov]
CC: Farngalo, Zuri [Farngalo.Zuri@epa.gov]; Benjamin, Lynorae [benjamin.lynorae@epa.gov]
Subject: RE: Pls resp by COB 3/30, Kentucky Monthly Call - 4/4- Topics?

Correction noted below.

And especially sorry to Jane – hope you read this one first!

From: Bailey, Ashten
Sent: Monday, March 27, 2017 6:01 PM
To: Akers, Brad <Akers.Brad@epa.gov>; Bailey, Ashten <Bailey.Ashten@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Bradley, Twunjala <Bradley.Twunjala@epa.gov>; Febres, Andres <febres-martinez.andres@epa.gov>; Lakeman, Sean <Lakeman.Sean@epa.gov>; Myers, Dianna <Myers.Dianna@epa.gov>; Notarianni, Michele <Notarianni.Michele@epa.gov>; Sanchez, Madolyn <Sanchez.Madolyn@epa.gov>; Scofield, Steven <Scofield.Steve@epa.gov>; Sheckler, Kelly A. <Sheckler.Kelly@epa.gov>; Ward, Nacosta <Ward.Nacosta@epa.gov>; Wong, Richard <Wong.Richard@epa.gov>
Cc: Farngalo, Zuri <Farngalo.Zuri@epa.gov>; Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: Pls resp by COB 3/30, Kentucky Monthly Call - 4/4- Topics?

Hi all,

The next Kentucky monthly call is scheduled for 4/4 from 1:30-2:30.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Everyone – please let me know if you have any topics you would like to add by COB 3/30.
Kelly, Dianna, and Jane – are you available to discuss the topics noted below?

Current list of topics:

Deliberative Process / Ex. 5

Ashten Bailey, Environmental Protection Specialist
U. S. Environmental Protection Agency, Region 4 | Air, Pesticides & Toxics Management Division
Air Planning and Implementation Branch | Air Regulatory Management Section
61 Forsyth Street, SW, Atlanta, GA 30303-8960
e: bailey.ashten@epa.gov | p: (404) 562-9164

Message

From: Triplett, Eric [Triplett.Eric@epa.gov]
Sent: 4/18/2018 6:24:48 PM
To: Notarianni, Michele [Notarianni.Michele@epa.gov]; Akers, Brad [Akers.Brad@epa.gov]; Bell, Tiereny [Bell.Tiereny@epa.gov]; Howard, Chris [Howard.Chris@epa.gov]
CC: Benjamin, Lynorae [benjamin.lynorae@epa.gov]
Subject: RE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT STEPS

Deliberative Process / Ex. 5

Thanks,
Eric

From: Notarianni, Michele
Sent: Wednesday, March 21, 2018 11:21 AM
To: Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: RE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT STEPS

Hello All,

Deliberative Process / Ex. 5

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Notarianni, Michele
Sent: Wednesday, March 21, 2018 11:17 AM
To: Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: REVIEW REQUESTED: By no later than April 21, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT STEPS

Hello Regional Haze Team,

1. **REVIEW REQUESTED:**

-

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

2. FILES TO VIEW:

- -
 -
- # Deliberative Process / Ex. 5

3. Next Steps:

- -
 -
 -
- # Deliberative Process / Ex. 5

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Notarianni, Michele
Sent: Thursday, March 16, 2017 5:36 PM
To: Elliott Bickerstaff <EBickerstaff@mdeq.ms.gov>; Charles Rainey <CRainey@mdeq.ms.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>; Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>
Subject: Preliminary draft comments regarding Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period.

Hello Elliott and Chuck,

Thank you for providing for our informal review Mississippi's revised draft regional haze progress report dated February 22, 2017, for the first implementation period. Below are our preliminary draft informal comments on this draft progress report. As we discussed on a recent call with you, these draft comments currently do not reflect the full regional haze team's review of the State's draft progress report, however, we wanted to provide you our initial feedback as soon as possible. We can also discuss these draft comments with you to assist in explaining them where needed. If you would like to have a call to discuss these, what days and times work best for you all?

I. Key Comments:

1. 40 CFR 51.308(g)(1):

- a. Section 2.0: Please address the status of the following control measures for 40 CFR 51.308(g)(1) which is described in Section 7.2.1 of Mississippi's regional haze state implementation plan (SIP) narrative: Mississippi's sources subject to Best Available Retrofit Technology (BART), the nitrogen oxides (NOx) SIP Call, and the "One-hour ozone SIPs".
- b. Section 2.1: Please clarify the status of the control measures described for electric generating units (EGUs) in Section 7.2.2 of Mississippi's regional haze SIP narrative. One way this could be done is to reference in the last sentence of Section 2.1 the EGU emissions reductions in Section 3.0.

II. General Comments:

1. Section 2.3: We recommend to add that the terms of the Tampa Electric Company consent agreement were required to be met by 2008.
2. Section 2.8, p.6: We recommend to briefly summarize what Table 1 in Section 2.8 shows.
3. Section 3.3: Please clarify the status of Plant Watson in relation to Louisiana's regional haze SIP similar to how DuPont DeLisle is addressed on page 11.
4. Section 4.0: We recommend identifying which of the pollutants are below the 2018 projections as noted in the text. Consider referring to Section 7.0 for an analysis and explanation of the SO₂ emissions trends from 2002 to 2014, and the increases in actual particulate matter emissions from 2002 to 2014.
5. Section 8.0: In the last sentence of Section 8.0, we recommend clarifying the wording to reflect Mississippi's situation with respect to 51.308(g)(6). We will work with you to address this comment.

III. Other Comments:

1. Section 1.0, p.1, para. 3:

- a. For accuracy, please delete "by 2064".
- b. For improved clarity, we suggest broadening the last sentence in paragraph 3 of Section 1.0 to indicate that the State developed a SIP to meet the regional haze requirements.

2. Section 2.0:

- a. General: In the discussion addressing 40 CFR 51.308(g)(1), we suggest referencing the discussion in Section 3.0 that Mississippi has no reasonable progress sources, or instead, moving Section 3.3 up to Section 2.0 and referencing it in Section 3.0 which addresses 40 CFR 51.308(g)(2).
- b. S.2.4, p.3: Consider adding a conclusory statement at the end of Section 2.4 that acknowledges that these requirements were implemented on the timeline in the regulation.
- c. S.2.7, p.5: We suggest to add a statement at the end of Section 2.7 expanding the implementation schedule for the nonroad standards to include that the reduction in fuel sulfur levels applied to most nonroad diesel fuel in 2010 and applied to fuel used in locomotive and marine vessels in 2012.
- d. S.2.8, p.5: We suggest updating the timelines for the maximum achievable control technology standards (MACT) in Section 2.8 and including a statement that indicates any additional emissions reductions from these updated standards may provide further assurance that Breton achieves its reasonable progress goals (RPGs). We will work with you to address this comment.
- e. S.2.11: We suggest adding to the explanatory statement to Section 2.11 that any emissions reductions from the "New Control Strategies" which were not relied upon by Mississippi in its regional haze SIP provide further assurance that Breton achieves its RPGs.
- f. S. 2.11.1: Consider including a statement that EPA updated certain emissions limits for new power plants under EPA's Mercury Air Toxics Standards Rule April 24, 2013. We can assist you with this update.
- g. S. 2.11.2., p.8: We suggest to update the status of EPA's final Data Requirements Rule in the second to last sentence of Section 2.11.2. We can assist you with this update.

3. Section 3.1:

- a. Consider clarifying that the first sentence regarding the State's regional haze SIP and its sulfates analysis applies to all the VISTAS Class I areas.

- b. Consider noting that sulfates continue to also be the major component of visibility impairment at the Breton Class I area as shown in Figures 2 and 3 of the progress report in Section 7.0.
 - c. “Figure 2” described in Section 3.1 appears to be missing from this progress report.
 - d. Please include the source of the data in Figure 1 and we suggest to include a brief statement summarizing what “Figure 1” shows.
 - e. Consider modifying the phrasing that emissions reductions were not needed for Breton’s control strategy to reflect that Mississippi’s sources were not identified as meeting Louisiana’s screening criteria for sources to evaluate for potential reasonable progress control.
- 4. **Section 3.3:** Consider to remove “AOI” or reference the State’s regional haze SIP or explain the term.
 - 5. **Section 10.0:** Consider identifying that the RPGs referenced in the second to last sentence refer to the Breton Class I area.
 - 6. **Tables and Figures:**
 - a. In Tables 3 and 4, consider either changing “EIS” to “NEI” for clarity and consistent with terminology describing the NEI elsewhere in the progress report or noting that these terms are interchangeable.
 - b. In Table 1, 4th column, 1st row – we suggest to update the term “VITAS”.
 - c. In Table 4, fourth row down, please check if “2011” is meant to read “2014”.
 - d. In Table 5, consider including a footnote to explain that the “Required Control Date” for Mississippi Phosphate Corporation is five years after the effective date of EPA’s final limited approval of the State’s regional haze SIP (July 27, 2012), which is July 27, 2017.
 - e. In Table 7, we suggest including the source of the 2002 data in Table 7 similar to how it is addressed for Table 10.
 - f. In Figures 2 and 3, please check if “Vision” is meant to read “Visibility”.

Michele

Michele Notarianni
U.S. EPA Region 4
404-562-9031
Notarianni.michele@epa.gov

Message

From: Notarianni, Michele [Notarianni.Michele@epa.gov]
Sent: 4/18/2018 2:51:52 PM
To: Akers, Brad [Akers.Brad@epa.gov]
Subject: RE: My commentRE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT S

Hi Brad,

Sure thing – Friday is clear unlike THU! Send me an invite?

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Akers, Brad
Sent: Wednesday, April 18, 2018 10:46 AM
To: Notarianni, Michele <Notarianni.Michele@epa.gov>
Subject: RE: My commentRE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT S

Hi Michele,

I am finished reviewing the document. I would like to talk with you about some of my potential comments. I have not specifically added them to the document, but I can do that after I talk with you. Are you available Friday? I plan to telework, but I think we could still run through my notes.

Thanks,
Brad

From: Notarianni, Michele
Sent: Friday, April 06, 2018 3:36 PM
To: Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: My commentRE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT STEPS

Hello All,

Thanks all for updating me on your work on this fresh check of the MS progress report SIP for regional haze. I gave it a fresh look with:

:

Deliberative Process / Ex. 5

- # Deliberative Process / Ex. 5
-

Deliberative Process / Ex. 5

II. Summary:

- # Deliberative Process / Ex. 5
-

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Notarianni, Michele
Sent: Wednesday, March 21, 2018 11:21 AM
To: Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: RE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT STEPS

Hello All,

Deliberative Process / Ex. 5

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Notarianni, Michele
Sent: Wednesday, March 21, 2018 11:17 AM
To: Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>;

Howard, Chris <Howard.Chris@epa.gov>

Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>

Subject: REVIEW REQUESTED: By no later than April 21, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT STEPS

Hello Regional Haze Team,

1. **REVIEW REQUESTED:**

- **Deliberative Process / Ex. 5**

2. **FILES TO VIEW:**

-
- **Deliberative Process / Ex. 5**
-

3. **Next Steps:**

Deliberative Process / Ex. 5

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Notarianni, Michele

Sent: Thursday, March 16, 2017 5:36 PM

To: Elliott Bickerstaff <EBickerstaff@mdeq.ms.gov>; Charles Rainey <CRainey@mdeq.ms.gov>

Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>; Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>

Subject: Preliminary draft comments regarding Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period.

Hello Elliott and Chuck,

Thank you for providing for our informal review Mississippi's revised draft regional haze progress report dated February 22, 2017, for the first implementation period. Below are our preliminary draft informal comments on this draft progress report. As we discussed on a recent call with you, these draft comments currently do not reflect the full regional haze team's review of the State's draft progress report, however, we wanted to provide you our initial feedback as soon as possible. We can also discuss these draft comments with you to assist in explaining them where needed. If you would like to have a call to discuss these, what days and times work best for you all?

I. Key Comments:

1. 40 CFR 51.308(g)(1):

- a. Section 2.0: Please address the status of the following control measures for 40 CFR 51.308(g)(1) which is described in Section 7.2.1 of Mississippi's regional haze state implementation plan (SIP) narrative: Mississippi's sources subject to Best Available Retrofit Technology (BART), the nitrogen oxides (NO_x) SIP Call, and the "One-hour ozone SIPs".
- b. Section 2.1: Please clarify the status of the control measures described for electric generating units (EGUs) in Section 7.2.2 of Mississippi's regional haze SIP narrative. One way this could be done is to reference in the last sentence of Section 2.1 the EGU emissions reductions in Section 3.0.

II. General Comments:

1. Section 2.3: We recommend to add that the terms of the Tampa Electric Company consent agreement were required to be met by 2008.
2. Section 2.8, p.6: We recommend to briefly summarize what Table 1 in Section 2.8 shows.
3. Section 3.3: Please clarify the status of Plant Watson in relation to Louisiana's regional haze SIP similar to how DuPont DeLisle is addressed on page 11.
4. Section 4.0: We recommend identifying which of the pollutants are below the 2018 projections as noted in the text. Consider referring to Section 7.0 for an analysis and explanation of the SO₂ emissions trends from 2002 to 2014, and the increases in actual particulate matter emissions from 2002 to 2014.
5. Section 8.0: In the last sentence of Section 8.0, we recommend clarifying the wording to reflect Mississippi's situation with respect to 51.308(g)(6). We will work with you to address this comment.

III. Other Comments:

1. Section 1.0, p.1, para. 3:

- a. For accuracy, please delete "by 2064".
- b. For improved clarity, we suggest broadening the last sentence in paragraph 3 of Section 1.0 to indicate that the State developed a SIP to meet the regional haze requirements.

2. Section 2.0:

- a. General: In the discussion addressing 40 CFR 51.308(g)(1), we suggest referencing the discussion in Section 3.0 that Mississippi has no reasonable progress sources, or instead, moving Section 3.3 up to Section 2.0 and referencing it in Section 3.0 which addresses 40 CFR 51.308(g)(2).
- b. S.2.4, p.3: Consider adding a conclusory statement at the end of Section 2.4 that acknowledges that these requirements were implemented on the timeline in the regulation.
- c. S.2.7, p.5: We suggest to add a statement at the end of Section 2.7 expanding the implementation schedule for the nonroad standards to include that the reduction in fuel sulfur levels applied to most nonroad diesel fuel in 2010 and applied to fuel used in locomotive and marine vessels in 2012.
- d. S.2.8, p.5: We suggest updating the timelines for the maximum achievable control technology standards (MACT) in Section 2.8 and including a statement that indicates any additional emissions reductions from these updated standards may provide further assurance that Breton achieves its reasonable progress goals (RPGs). We will work with you to address this comment.

- e. S.2.11: We suggest adding to the explanatory statement to Section 2.11 that any emissions reductions from the “New Control Strategies” which were not relied upon by Mississippi in its regional haze SIP provide further assurance that Breton achieves its RPGs.
 - f. S. 2.11.1: Consider including a statement that EPA updated certain emissions limits for new power plants under EPA’s Mercury Air Toxics Standards Rule April 24, 2013. We can assist you with this update.
 - g. S. 2.11.2., p.8: We suggest to update the status of EPA’s final Data Requirements Rule in the second to last sentence of Section 2.11.2. We can assist you with this update.
3. **Section 3.1:**
- a. Consider clarifying that the first sentence regarding the State’s regional haze SIP and its sulfates analysis applies to all the VISTAS Class I areas.
 - b. Consider noting that sulfates continue to also be the major component of visibility impairment at the Breton Class I area as shown in Figures 2 and 3 of the progress report in Section 7.0.
 - c. “Figure 2” described in Section 3.1 appears to be missing from this progress report.
 - d. Please include the source of the data in Figure 1 and we suggest to include a brief statement summarizing what “Figure 1” shows.
 - e. Consider modifying the phrasing that emissions reductions were not needed for Breton’s control strategy to reflect that Mississippi’s sources were not identified as meeting Louisiana’s screening criteria for sources to evaluate for potential reasonable progress control.
4. **Section 3.3:** Consider to remove “AOI” or reference the State’s regional haze SIP or explain the term.
5. **Section 10.0:** Consider identifying that the RPGs referenced in the second to last sentence refer to the Breton Class I area.
6. **Tables and Figures:**
- a. In Tables 3 and 4, consider either changing “EIS” to “NEI” for clarity and consistent with terminology describing the NEI elsewhere in the progress report or noting that these terms are interchangeable.
 - b. In Table 1, 4th column, 1st row – we suggest to update the term “VITAS”.
 - c. In Table 4, fourth row down, please check if “2011” is meant to read “2014”.
 - d. In Table 5, consider including a footnote to explain that the “Required Control Date” for Mississippi Phosphate Corporation is five years after the effective date of EPA’s final limited approval of the State’s regional haze SIP (July 27, 2012), which is July 27, 2017.
 - e. In Table 7, we suggest including the source of the 2002 data in Table 7 similar to how it is addressed for Table 10.
 - f. In Figures 2 and 3, please check if “Vision” is meant to read “Visibility”.

Michele

Michele Notarianni
 U.S. EPA Region 4
 404-562-9031
Notarianni.michele@epa.gov

From: Elliott Bickerstaff [EBickerstaff@mdeq.ms.gov]
Sent: 3/20/2017 6:42:19 PM
To: Notarianni, Michele [Notarianni.Michele@epa.gov]; Charles Rainey [CRainey@mdeq.ms.gov]
CC: Benjamin, Lynorae [benjamin.lynorae@epa.gov]; Akers, Brad [Akers.Brad@epa.gov]; Bell, Tiereny [Bell.Tiereny@epa.gov]; Howard, Chris [Howard.Chris@epa.gov]
Subject: RE: Preliminary draft comments regarding Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period.

Thanks Michele, we already have a call Thursday afternoon. Talk about it then?

From: Notarianni, Michele [mailto:Notarianni.Michele@epa.gov]
Sent: Thursday, March 16, 2017 4:36 PM
To: Elliott Bickerstaff <EBickerstaff@mdeq.ms.gov>; Charles Rainey <CRainey@mdeq.ms.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>; Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>
Subject: Preliminary draft comments regarding Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period.

Hello Elliott and Chuck,

Thank you for providing for our informal review Mississippi's revised draft regional haze progress report dated February 22, 2017, for the first implementation period. Below are our preliminary draft informal comments on this draft progress report. As we discussed on a recent call with you, these draft comments currently do not reflect the full regional haze team's review of the State's draft progress report, however, we wanted to provide you our initial feedback as soon as possible. We can also discuss these draft comments with you to assist in explaining them where needed. If you would like to have a call to discuss these, what days and times work best for you all?

I. Key Comments:

1. 40 CFR 51.308(g)(1):

- a. Section 2.0: Please address the status of the following control measures for 40 CFR 51.308(g)(1) which is described in Section 7.2.1 of Mississippi's regional haze state implementation plan (SIP) narrative: Mississippi's sources subject to Best Available Retrofit Technology (BART), the nitrogen oxides (NOx) SIP Call, and the "One-hour ozone SIPs".
- b. Section 2.1: Please clarify the status of the control measures described for electric generating units (EGUs) in Section 7.2.2 of Mississippi's regional haze SIP narrative. One way this could be done is to reference in the last sentence of Section 2.1 the EGU emissions reductions in Section 3.0.

II. General Comments:

1. Section 2.3: We recommend to add that the terms of the Tampa Electric Company consent agreement were required to be met by 2008.
2. Section 2.8, p.6: We recommend to briefly summarize what Table 1 in Section 2.8 shows.
3. Section 3.3: Please clarify the status of Plant Watson in relation to Louisiana's regional haze SIP similar to how DuPont DeLisle is addressed on page 11.
4. Section 4.0: We recommend identifying which of the pollutants are below the 2018 projections as noted in the text. Consider referring to Section 7.0 for an analysis and explanation of the SO₂ emissions trends from 2002 to 2014, and the increases in actual particulate matter emissions from 2002 to 2014.
5. Section 8.0: In the last sentence of Section 8.0, we recommend clarifying the wording to reflect Mississippi's situation with respect to 51.308(g)(6). We will work with you to address this comment.

III. Other Comments:

1. **Section 1.0, p.1, para. 3:**

- a. For accuracy, please delete “by 2064”.
- b. For improved clarity, we suggest broadening the last sentence in paragraph 3 of Section 1.0 to indicate that the State developed a SIP to meet the regional haze requirements.

2. **Section 2.0:**

- a. **General:** In the discussion addressing 40 CFR 51.308(g)(1), we suggest referencing the discussion in Section 3.0 that Mississippi has no reasonable progress sources, or instead, moving Section 3.3 up to Section 2.0 and referencing it in Section 3.0 which addresses 40 CFR 51.308(g)(2).
- b. **S.2.4, p.3:** Consider adding a conclusory statement at the end of Section 2.4 that acknowledges that these requirements were implemented on the timeline in the regulation.
- c. **S.2.7, p.5:** We suggest to add a statement at the end of Section 2.7 expanding the implementation schedule for the nonroad standards to include that the reduction in fuel sulfur levels applied to most nonroad diesel fuel in 2010 and applied to fuel used in locomotive and marine vessels in 2012.
- d. **S.2.8, p.5:** We suggest updating the timelines for the maximum achievable control technology standards (MACT) in Section 2.8 and including a statement that indicates any additional emissions reductions from these updated standards may provide further assurance that Breton achieves its reasonable progress goals (RPGs). We will work with you to address this comment.
- e. **S.2.11:** We suggest adding to the explanatory statement to Section 2.11 that any emissions reductions from the “New Control Strategies” which were not relied upon by Mississippi in its regional haze SIP provide further assurance that Breton achieves its RPGs.
- f. **S. 2.11.1:** Consider including a statement that EPA updated certain emissions limits for new power plants under EPA’s Mercury Air Toxics Standards Rule April 24, 2013. We can assist you with this update.
- g. **S. 2.11.2., p.8:** We suggest to update the status of EPA’s final Data Requirements Rule in the second to last sentence of Section 2.11.2. We can assist you with this update.

3. **Section 3.1:**

- a. Consider clarifying that the first sentence regarding the State’s regional haze SIP and its sulfates analysis applies to all the VISTAS Class I areas.
- b. Consider noting that sulfates continue to also be the major component of visibility impairment at the Breton Class I area as shown in Figures 2 and 3 of the progress report in Section 7.0.
- c. “Figure 2” described in Section 3.1 appears to be missing from this progress report.
- d. Please include the source of the data in Figure 1 and we suggest to include a brief statement summarizing what “Figure 1” shows.
- e. Consider modifying the phrasing that emissions reductions were not needed for Breton’s control strategy to reflect that Mississippi’s sources were not identified as meeting Louisiana’s screening criteria for sources to evaluate for potential reasonable progress control.

4. **Section 3.3:** Consider to remove “AOI” or reference the State’s regional haze SIP or explain the term.

5. **Section 10.0:** Consider identifying that the RPGs referenced in the second to last sentence refer to the Breton Class I area.

6. **Tables and Figures:**

- a. In Tables 3 and 4, consider either changing “EIS” to “NEI” for clarity and consistent with terminology describing the NEI elsewhere in the progress report or noting that these terms are interchangeable.
- b. In Table 1, 4th column, 1st row – we suggest to update the term “VITAS”.
- c. In Table 4, fourth row down, please check if “2011” is meant to read “2014”.
- d. In Table 5, consider including a footnote to explain that the “Required Control Date” for Mississippi Phosphate Corporation is five years after the effective date of EPA’s final limited approval of the State’s regional haze SIP (July 27, 2012), which is July 27, 2017.
- e. In Table 7, we suggest including the source of the 2002 data in Table 7 similar to how it is addressed for Table 10.
- f. In Figures 2 and 3, please check if “Vision” is meant to read “Visibility”.

Michele

Michele Notarianni
U.S. EPA Region 4
404-562-9031
Notarianni.michele@epa.gov

Message

From: Notarianni, Michele [Notarianni.Michele@epa.gov]
Sent: 10/5/2017 3:35:41 PM
To: Akers, Brad [Akers.Brad@epa.gov]
Subject: RE: Hi Brad - do you know if there is a way to check why there is data missing on the CAMD website for 2016 for a few facilities? They all appear to be operating still in 2016 so not sure why?

Thanks Brad, I meant to only pull electric utilities – is there a way for me to only pull EGUs?

Michele

Michele Notarianni
U.S. EPA Region 4
404-562-9031
Notarianni.michele@epa.gov

From: Akers, Brad
Sent: Thursday, October 05, 2017 11:34 AM
To: Notarianni, Michele <Notarianni.Michele@epa.gov>
Subject: RE: Hi Brad - do you know if there is a way to check why there is data missing on the CAMD website for 2016 for a few facilities? They all appear to be operating still in 2016 so not sure why?

Hi Michele,

I think those sources do not have SO2 emissions because they are not EGUs. They are maybe only in CAMD for the NOx SIP Call, so they'd only report those emissions. We can get 2016 emissions from the NEI (EIS system) for those other sources. So yes there were SO2 emissions during 2016 for those sources, but they were not required to report to the CAMD system for Part 75 monitoring.

Thanks,
Brad

From: Notarianni, Michele
Sent: Thursday, October 05, 2017 10:51 AM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: Hi Brad - do you know if there is a way to check why there is data missing on the CAMD website for 2016 for a few facilities? They all appear to be operating still in 2016 so not sure why?

Hi Brad –

Thanks again for CAMD help the other day. I was wondering do you know if there is a way to check why there is data missing on the CAMD website for 2016 for a few facilities? Richard and I learned through EIS Gateway that it usually is due to a unit shutdown which we verified by checking earlier years and “operational status”, however, all four facilities listed below appear to be operating.

These four facilities all indicate they are still operating:

State	Facility Name	Facility ID (ORISPL)	Year	SO2 (tons)	Heat Input (MMBtu)	County
NC	KapStone Paper and Packaging Corp	50254	2016		1299146	Halifax
NC	NC Renewable Power - Elizabethtown	10380	2016			Bladen
NC	University of NC Chapel Hill	54276	2016		834107.3	Orange
NC	Weyerhaeuser - New Bern	50188	2016		2333491	Craven

Deliberative Process / Ex. 5

Michele

Michele Notarianni

U.S. EPA Region 4

404-562-9031

Notarianni.michele@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 5/25/2018 1:48:28 PM
To: Murray, Julie [Murray.Julie@epa.gov]
Subject: RE: COMMENTS REQUESTED: Pre-Draft Version 2 for SC CAIR and NOx SIP Call

Hi Julie,

Please disregard my email. I apologize for mixing up my email addresses! I mean to include Beth Murray from CAMD on this review.

Thanks,
Brad Akers

From: Akers, Brad
Sent: Friday, May 25, 2018 9:47 AM
To: Bradley, Twunjala <Bradley.Twunjala@epa.gov>; Bailey, Ashten <Bailey.Ashten@epa.gov>; Scofield, Steven <Scofield.Steve@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>; Lifland, David <Lifland.David@epa.gov>; Murray, Julie <Murray.Julie@epa.gov>; Mercado, Edgar <Mercado.Edgar@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: COMMENTS REQUESTED: Pre-Draft Version 2 for SC CAIR and NOx SIP Call

Hi all,

We just received a second pre-draft from South Carolina regarding the NOx SIP Call and removing the CAIR regulation from the SIP, including: 1) NOx SIP Call compliance demonstrations for large non-EGUs and EGUs; 2) a 110(l) non-interference demonstration for removing CAIR from the SIP; and 3) a request to release large non-EGUs from Part 75 monitoring and reporting requirements. The supporting materials are not entirely complete. SC DHEC is still working through the PTE for EGUs, so "Appendix 4" is not included. The State understands that this is our draft review of an incomplete submittal.

Deliberative Process / Ex. 5

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 5/25/2018 1:47:25 PM
To: Bradley, Twunjala [Bradley.Twunjala@epa.gov]; Bailey, Ashten [Bailey.Ashten@epa.gov]; Scofield, Steven [Scofield.Steve@epa.gov]; Triplett, Eric [Triplett.Eric@epa.gov]; Lifland, David [Lifland.David@epa.gov]; Murray, Julie [Murray.Julie@epa.gov]; Mercado, Edgar [Mercado.Edgar@epa.gov]
CC: Benjamin, Lynorae [benjamin.lynorae@epa.gov]
Subject: COMMENTS REQUESTED: Pre-Draft Version 2 for SC CAIR and NOx SIP Call

Hi all,

We just received a second pre-draft from South Carolina regarding the NOx SIP Call and removing the CAIR regulation from the SIP, including: 1) NOx SIP Call compliance demonstrations for large non-EGUs and EGUs; 2) a 110(l) non-interference demonstration for removing CAIR from the SIP; and 3) a request to release large non-EGUs from Part 75 monitoring and reporting requirements. The supporting materials are not entirely complete. SC DHEC is still working through the PTE for EGUs, so "Appendix 4" is not included. The State understands that this is our draft review of an incomplete submittal.

Deliberative Process / Ex. 5

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 8/28/2018 12:24:14 PM
To: Bradley, Twunjala [Bradley.Twunjala@epa.gov]; Scofield, Steven [Scofield.Steve@epa.gov]; Bailey, Ashten [Bailey.Ashten@epa.gov]; Sanchez, Madolyn [Sanchez.Madolyn@epa.gov]
CC: Benjamin, Lynorae [benjamin.lynorae@epa.gov]
Subject: FW: NOx SIP Call

Deliberative Process / Ex. 5

Thanks,
Brad

From: Wall, Mary Peyton [mailto:wallmp@dhec.sc.gov]
Sent: Tuesday, August 28, 2018 8:22 AM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: NOx SIP Call

Brad-

After we chatted yesterday, I filled Robbie in on your question. He said that if slight changes need to be made from our original incorporation to match the existing federal rule, there should be no problems. Hope this helps.

Mary Peyton

Mary Peyton D. Wall
Section Manager, Air Regulation and SIP Management
S.C. Dept. of Health & Environmental Control
Office: (803) 898-4064
Fax: (803) 898-4117
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 3/21/2018 12:16:59 PM
To: Frizzell, Gretchen [Frizzell.Gretchen@epa.gov]
Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Deliberative Process / Ex. 5

Thanks,
Brad

From: Frizzell, Gretchen
Sent: Monday, March 19, 2018 6:52 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Deliberative Process / Ex. 5

Gretchen M. Frizzell · Attorney-Adviser
Office of Regional Counsel · EPA Region 4
404.562.8089 · frizzell.gretchen@epa.gov

From: Akers, Brad
Sent: Monday, March 19, 2018 2:52 PM
To: Frizzell, Gretchen <Frizzell.Gretchen@epa.gov>
Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Hi Gretchen,

I have attached SC-104. The revisions start on page 66/296. The SIP narrative elsewhere may discuss the new text in more detail, but I'm not sure.

Thanks,
Brad

From: Akers, Brad
Sent: Tuesday, March 13, 2018 8:37 AM
To: Frizzell, Gretchen <Frizzell.Gretchen@epa.gov>
Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Hi Gretchen,

Deliberative Process / Ex. 5

Thanks,
Brad

From: Frizzell, Gretchen
Sent: Monday, March 12, 2018 2:53 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Thanks, Brad. Are you expecting ORC comments by the same date you mentioned to Joel and Jane (3/15)?

Gretchen M. Frizzell · Attorney-Adviser
Office of Regional Counsel · EPA Region 4
404.562.8089 · frizzell.gretchen@epa.gov

From: Akers, Brad
Sent: Wednesday, March 07, 2018 2:50 PM
To: Frizzell, Gretchen <Frizzell.Gretchen@epa.gov>
Cc: Huey, Joel <Huey.Joel@epa.gov>; Spann, Jane <Spann.Jane@epa.gov>; Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: FW: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Hi Gretchen,

Deliberative Process / Ex. 5

Thanks,
Brad

From: Akers, Brad
Sent: Thursday, March 01, 2018 1:30 PM
To: Huey, Joel <Huey.Joel@epa.gov>; Spann, Jane <Spann.Jane@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Hello Joel and Jane,

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 3/13/2018 12:36:42 PM
To: Frizzell, Gretchen [Frizzell.Gretchen@epa.gov]
Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Hi Gretchen,

Yes, if possible. Monday, 3/19 would be okay as well. We have our annual visit with the State on Tuesday, 3/20, so we'd like to be able to transmit any draft comments at that time. Let me know if you have any questions.

Thanks,
Brad

From: Frizzell, Gretchen
Sent: Monday, March 12, 2018 2:53 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Thanks, Brad. Are you expecting ORC comments by the same date you mentioned to Joel and Jane (3/15)?

Gretchen M. Frizzell · Attorney-Adviser
Office of Regional Counsel · EPA Region 4
404.562.8089 · frizzell.gretchen@epa.gov

From: Akers, Brad
Sent: Wednesday, March 07, 2018 2:50 PM
To: Frizzell, Gretchen <Frizzell.Gretchen@epa.gov>
Cc: Huey, Joel <Huey.Joel@epa.gov>; Spann, Jane <Spann.Jane@epa.gov>; Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: FW: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Hi Gretchen,

Deliberative Process / Ex. 5

Thanks,
Brad

From: Akers, Brad
Sent: Thursday, March 01, 2018 1:30 PM
To: Huey, Joel <Huey.Joel@epa.gov>; Spann, Jane <Spann.Jane@epa.gov>

Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>

Subject: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Hello Joel and Jane,

Deliberative Process / Ex. 5

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 8/15/2018 5:28:51 PM
To: Bradley, Twunjala [Bradley.Twunjala@epa.gov]; Scofield, Steven [Scofield.Steve@epa.gov]; Bailey, Ashten [Bailey.Ashten@epa.gov]; Benjamin, Lynorae [benjamin.lynorae@epa.gov]; Sanchez, Madolyn [Sanchez.Madolyn@epa.gov]
Subject: SC August 2018 Monthly Call - NOx SIP Call/CAIR
Attachments: NOx SIP Call/CAIR removal timeline

Hi all,

Deliberative Process / Ex. 5

Ashten: Please feel free to make edits to what I captured here or in the document.

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 4/18/2018 3:10:01 PM
To: Notarianni, Michele [Notarianni.Michele@epa.gov]
Subject: RE: My commentRE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT S

Deliberative Process / Ex. 5

Brad

From: Notarianni, Michele
Sent: Wednesday, April 18, 2018 10:52 AM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: RE: My commentRE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT S

Hi Brad,

Sure thing – Friday is clear unlike THU! Send me an invite?

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Akers, Brad
Sent: Wednesday, April 18, 2018 10:46 AM
To: Notarianni, Michele <Notarianni.Michele@epa.gov>
Subject: RE: My commentRE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT S

Hi Michele,

Deliberative Process / Ex. 5

Thanks,
Brad

From: Notarianni, Michele
Sent: Friday, April 06, 2018 3:36 PM
To: Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>

Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>

Subject: My commentRE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT STEPS

Hello All,

Thanks all for updating me on your work on this fresh check of the MS progress report SIP for regional haze. I gave it a fresh look with:

-
-
-
-

Deliberative Process / Ex. 5

I. **Comments:** Attached are my EPA comments using the following codes found at the top of the file: see yellow for EPA comments with this coding: **EPA COMMENT CODE: --"I = Key Comment, II = General Comment, III = Other Comment"**. **Key Comments** are a must b/c they are required under reg or statute. **General Comments** are recommendations b/c they are items we may receive adverse comment and have to go back to them on. **Other Comments** are suggestions that don't fit the above categories.

II. Summary:

-
-
-

Deliberative Process / Ex. 5

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Notarianni, Michele

Sent: Wednesday, March 21, 2018 11:21 AM

To: Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>

Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>

Subject: RE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT STEPS

Hello All,

Deliberative Process / Ex. 5

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Notarianni, Michele
Sent: Wednesday, March 21, 2018 11:17 AM
To: Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: REVIEW REQUESTED: By no later than April 21, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:
....+NEXT STEPS

Hello Regional Haze Team,

1. REVIEW REQUESTED:

- **Deliberative Process / Ex. 5**

2. FILES TO VIEW:

-
- **Deliberative Process / Ex. 5**
-

3. Next Steps:

-
- **Deliberative Process / Ex. 5**
-
-

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Notarianni, Michele

Sent: Thursday, March 16, 2017 5:36 PM

To: Elliott Bickerstaff <EBickerstaff@mdeq.ms.gov>; Charles Rainey <CRainey@mdeq.ms.gov>

Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>; Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>

Subject: Preliminary draft comments regarding Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period.

Hello Elliott and Chuck,

Thank you for providing for our informal review Mississippi's revised draft regional haze progress report dated February 22, 2017, for the first implementation period. Below are our preliminary draft informal comments on this draft progress report. As we discussed on a recent call with you, these draft comments currently do not reflect the full regional haze team's review of the State's draft progress report, however, we wanted to provide you our initial feedback as soon as possible. We can also discuss these draft comments with you to assist in explaining them where needed. If you would like to have a call to discuss these, what days and times work best for you all?

I. Key Comments:

1. 40 CFR 51.308(g)(1):

- a. Section 2.0: Please address the status of the following control measures for 40 CFR 51.308(g)(1) which is described in Section 7.2.1 of Mississippi's regional haze state implementation plan (SIP) narrative: Mississippi's sources subject to Best Available Retrofit Technology (BART), the nitrogen oxides (NOx) SIP Call, and the "One-hour ozone SIPs".
- b. Section 2.1: Please clarify the status of the control measures described for electric generating units (EGUs) in Section 7.2.2 of Mississippi's regional haze SIP narrative. One way this could be done is to reference in the last sentence of Section 2.1 the EGU emissions reductions in Section 3.0.

II. General Comments:

1. Section 2.3: We recommend to add that the terms of the Tampa Electric Company consent agreement were required to be met by 2008.
2. Section 2.8, p.6: We recommend to briefly summarize what Table 1 in Section 2.8 shows.
3. Section 3.3: Please clarify the status of Plant Watson in relation to Louisiana's regional haze SIP similar to how DuPont DeLisle is addressed on page 11.
4. Section 4.0: We recommend identifying which of the pollutants are below the 2018 projections as noted in the text. Consider referring to Section 7.0 for an analysis and explanation of the SO₂ emissions trends from 2002 to 2014, and the increases in actual particulate matter emissions from 2002 to 2014.
5. Section 8.0: In the last sentence of Section 8.0, we recommend clarifying the wording to reflect Mississippi's situation with respect to 51.308(g)(6). We will work with you to address this comment.

III. Other Comments:

1. Section 1.0, p.1, para. 3:
 - a. For accuracy, please delete "by 2064".
 - b. For improved clarity, we suggest broadening the last sentence in paragraph 3 of Section 1.0 to indicate that the State developed a SIP to meet the regional haze requirements.
2. Section 2.0:

- a. General: In the discussion addressing 40 CFR 51.308(g)(1), we suggest referencing the discussion in Section 3.0 that Mississippi has no reasonable progress sources, or instead, moving Section 3.3 up to Section 2.0 and referencing it in Section 3.0 which addresses 40 CFR 51.308(g)(2).
 - b. S.2.4, p.3: Consider adding a conclusory statement at the end of Section 2.4 that acknowledges that these requirements were implemented on the timeline in the regulation.
 - c. S.2.7, p.5: We suggest to add a statement at the end of Section 2.7 expanding the implementation schedule for the nonroad standards to include that the reduction in fuel sulfur levels applied to most nonroad diesel fuel in 2010 and applied to fuel used in locomotive and marine vessels in 2012.
 - d. S.2.8, p.5: We suggest updating the timelines for the maximum achievable control technology standards (MACT) in Section 2.8 and including a statement that indicates any additional emissions reductions from these updated standards may provide further assurance that Breton achieves its reasonable progress goals (RPGs). We will work with you to address this comment.
 - e. S.2.11: We suggest adding to the explanatory statement to Section 2.11 that any emissions reductions from the “New Control Strategies” which were not relied upon by Mississippi in its regional haze SIP provide further assurance that Breton achieves its RPGs.
 - f. S. 2.11.1: Consider including a statement that EPA updated certain emissions limits for new power plants under EPA’s Mercury Air Toxics Standards Rule April 24, 2013. We can assist you with this update.
 - g. S. 2.11.2., p.8: We suggest to update the status of EPA’s final Data Requirements Rule in the second to last sentence of Section 2.11.2. We can assist you with this update.
3. **Section 3.1:**
 - a. Consider clarifying that the first sentence regarding the State’s regional haze SIP and its sulfates analysis applies to all the VISTAS Class I areas.
 - b. Consider noting that sulfates continue to also be the major component of visibility impairment at the Breton Class I area as shown in Figures 2 and 3 of the progress report in Section 7.0.
 - c. “Figure 2” described in Section 3.1 appears to be missing from this progress report.
 - d. Please include the source of the data in Figure 1 and we suggest to include a brief statement summarizing what “Figure 1” shows.
 - e. Consider modifying the phrasing that emissions reductions were not needed for Breton’s control strategy to reflect that Mississippi’s sources were not identified as meeting Louisiana’s screening criteria for sources to evaluate for potential reasonable progress control.
 4. **Section 3.3:** Consider to remove “AOF” or reference the State’s regional haze SIP or explain the term.
 5. **Section 10.0:** Consider identifying that the RPGs referenced in the second to last sentence refer to the Breton Class I area.
 6. **Tables and Figures:**
 - a. In Tables 3 and 4, consider either changing “EIS” to “NEI” for clarity and consistent with terminology describing the NEI elsewhere in the progress report or noting that these terms are interchangeable.
 - b. In Table 1, 4th column, 1st row – we suggest to update the term “VITAS”.
 - c. In Table 4, fourth row down, please check if “2011” is meant to read “2014”.
 - d. In Table 5, consider including a footnote to explain that the “Required Control Date” for Mississippi Phosphate Corporation is five years after the effective date of EPA’s final limited approval of the State’s regional haze SIP (July 27, 2012), which is July 27, 2017.
 - e. In Table 7, we suggest including the source of the 2002 data in Table 7 similar to how it is addressed for Table 10.
 - f. In Figures 2 and 3, please check if “Vision” is meant to read “Visibility”.

Michele

Michele Notarianni
U.S. EPA Region 4

404-562-9031

Notarianni.michele@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 7/19/2018 8:20:29 PM
To: Bradley, Twunjala [Bradley.Twunjala@epa.gov]
CC: Bailey, Ashten [Bailey.Ashten@epa.gov]; Scofield, Steven [Scofield.Steve@epa.gov]
Subject: RE: Response on the process for completing our present regulatory/SIP approval EOY project

Hi Twunjala,

Deliberative Process / Ex. 5

Thanks,
Brad

From: Bradley, Twunjala
Sent: Thursday, July 19, 2018 2:58 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Cc: Bailey, Ashten <Bailey.Ashten@epa.gov>; Scofield, Steven <Scofield.Steve@epa.gov>
Subject: FW: Response on the process for completing our present regulatory/SIP approval EOY project

FYI

Twunjala Bradley

U. S. Environmental Protection Agency | Region 4
Air, Pesticides & Toxics Management Division
Air Planning and Implementation Branch | Air Regulatory Management Section
61 Forsyth Street, SW, Atlanta, GA 30303-8960
email: bradley.twunjala@epa.gov | phone: (404) 562-9352

From: Brown, Robbie [<mailto:brownrj@dhec.sc.gov>]
Sent: Thursday, July 19, 2018 2:33 PM
To: Bradley, Twunjala <Bradley.Twunjala@epa.gov>; Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Cc: Wall, Mary Peyton <wallmp@dhec.sc.gov>; Miller, Dawn K. <MillerDK@dhec.sc.gov>
Subject: Response on the process for completing our present regulatory/SIP approval EOY project

Lynorae and Twunjala,

You have asked about the process for the Department to consider and address EPA's concerns regarding the Notice of Proposed Regulation (Document No. 4814) published in the State Register on June 22, 2018, specifically including the proposed repeal of the Department's CAIR regulation.

The comment period for the Notice of Proposed Regulation closes on July 23, 2018. Pursuant to S.C. Code Section 1-23-110(C)(2), final regulations may include substantive changes to the content of the regulation as

proposed only if the substantive change was "raised, considered, or discussed by public comment received." To ensure the Department has the opportunity to consider EPA's concerns and address them as appropriate when promulgating the Department's final regulation, please submit comments to the Department stating EPA's concerns and/or disagreement with the repeal of CAIR as proposed and any potential changes EPA would like the Department to consider. Comments need not be lengthy and may be formal or informal (email is acceptable) and general in nature, so long as the comments clearly identify the subject of EPA's concerns and indicate EPA's position regarding any changes or additions to what has been proposed. More detailed discussions concerning the specific content and structure of any changes under consideration may follow after the comment period, so long as general comments are received on the issue.

Should EPA provide comments during this period, these comments would be considered and changes as appropriate would be made in the final regulation package to address these concerns. The revised package would be submitted for consideration at the following Board hearing and, if approved, sent on for publication in the State Register and become state effective at that time. Because the changes in this regulatory package are for the purpose of maintaining compliance with federal requirements, legislative approval is not needed.

A separate SIP submittal package would be prepared for EPA review and approval. Because this package has content in addition to the regulation changes, it would be public noticed and then formally submitted to EPA region 4.

As stated in the Notice of Proposed Regulation, comments should be submitted to Roger Jerry in the Bureau of Air Quality, S.C. Department of Health and Environmental Control. They may be submitted by email at jerryre@dhec.sc.gov; by fax at 803-898-4117; or by mail to Roger Jerry, Bureau of Air Quality, S.C. Department of Health and Environmental Control, 2600 Bull Street, Columbia, SC 29201. Comments must be received by the Department **by 5:00 pm on July 23, 2018.**

Thanks,

Robbie.

--

Robert J. Brown, Jr., Director
Division of Air Assessment and Regulation
SCDHEC Bureau of Air Quality
2600 Bull Street, Columbia, SC 29201
803.898.4105
803.465.1533 (mobile)
803.898.4487 (fax)
brownrj@dhec.sc.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 4/18/2018 2:46:01 PM
To: Notarianni, Michele [Notarianni.Michele@epa.gov]
Subject: RE: My commentRE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT S

Hi Michele,

Deliberative Process / Ex. 5

Thanks,
Brad

From: Notarianni, Michele
Sent: Friday, April 06, 2018 3:36 PM
To: Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: My commentRE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT STEPS

Hello All,

Thanks all for updating me on your work on this fresh check of the MS progress report SIP for regional haze. I gave it a fresh look with:

-
-
-
-

Deliberative Process / Ex. 5

I. **Comments:** Attached are my EPA comments using the following codes found at the top of the file: see yellow for EPA comments with this coding: **EPA COMMENT CODE:** --"I = Key Comment, II = General Comment, III = Other Comment". Key Comments are a must b/c they are required under reg or statute. General Comments are recommendations b/c they are items we may receive adverse comment and have to go back to them on. Other Comments are suggestions that don't fit the above categories.

II. Summary:

-
-

Deliberative Process / Ex. 5

- Deliberative Process / Ex. 5

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Notarianni, Michele
Sent: Wednesday, March 21, 2018 11:21 AM
To: Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: RE: REVIEW REQUESTED: By no later than April 20, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT STEPS

Hello All,

Deliberative Process / Ex. 5

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Notarianni, Michele
Sent: Wednesday, March 21, 2018 11:17 AM
To: Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Triplett, Eric <Triplett.Eric@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: REVIEW REQUESTED: By no later than April 21, 2018, COB, please review Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period, with a fresh look to see if:+NEXT STEPS

Hello Regional Haze Team,

1. REVIEW REQUESTED:

- Deliberative Process / Ex. 5

2. FILES TO VIEW:

- Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

3. Next Steps:

Deliberative Process / Ex. 5

Michele

Michele Notarianni
U.S. EPA Region 4
(404) 562-9031 (phone)
Notarianni.michele@epa.gov (e-mail)

From: Notarianni, Michele
Sent: Thursday, March 16, 2017 5:36 PM
To: Elliott Bickerstaff <EBickerstaff@mdeq.ms.gov>; Charles Rainey <CRainey@mdeq.ms.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>; Akers, Brad <Akers.Brad@epa.gov>; Bell, Tiereny <Bell.Tiereny@epa.gov>; Howard, Chris <Howard.Chris@epa.gov>
Subject: Preliminary draft comments regarding Mississippi's revised draft regional haze progress report SIP dated February 22, 2017, for the first implementation period.

Hello Elliott and Chuck,

Thank you for providing for our informal review Mississippi's revised draft regional haze progress report dated February 22, 2017, for the first implementation period. Below are our preliminary draft informal comments on this draft progress report. As we discussed on a recent call with you, these draft comments currently do not reflect the full regional haze team's review of the State's draft progress report, however, we wanted to provide you our initial feedback as soon as possible. We can also discuss these draft comments with you to assist in explaining them where needed. If you would like to have a call to discuss these, what days and times work best for you all?

I. Key Comments:

1. 40 CFR 51.308(g)(1):

- a. Section 2.0: Please address the status of the following control measures for 40 CFR 51.308(g)(1) which is described in Section 7.2.1 of Mississippi's regional haze state implementation plan (SIP) narrative: Mississippi's sources subject to Best Available Retrofit Technology (BART), the nitrogen oxides (NOx) SIP Call, and the "One-hour ozone SIPs".

- b. Section 2.1: Please clarify the status of the control measures described for electric generating units (EGUs) in Section 7.2.2 of Mississippi's regional haze SIP narrative. One way this could be done is to reference in the last sentence of Section 2.1 the EGU emissions reductions in Section 3.0.

II. General Comments:

1. Section 2.3: We recommend to add that the terms of the Tampa Electric Company consent agreement were required to be met by 2008.
2. Section 2.8, p.6: We recommend to briefly summarize what Table 1 in Section 2.8 shows.
3. Section 3.3: Please clarify the status of Plant Watson in relation to Louisiana's regional haze SIP similar to how DuPont DeLisle is addressed on page 11.
4. Section 4.0: We recommend identifying which of the pollutants are below the 2018 projections as noted in the text. Consider referring to Section 7.0 for an analysis and explanation of the SO₂ emissions trends from 2002 to 2014, and the increases in actual particulate matter emissions from 2002 to 2014.
5. Section 8.0: In the last sentence of Section 8.0, we recommend clarifying the wording to reflect Mississippi's situation with respect to 51.308(g)(6). We will work with you to address this comment.

III. Other Comments:

1. Section 1.0, p.1, para. 3:

- a. For accuracy, please delete "by 2064".
- b. For improved clarity, we suggest broadening the last sentence in paragraph 3 of Section 1.0 to indicate that the State developed a SIP to meet the regional haze requirements.

2. Section 2.0:

- a. General: In the discussion addressing 40 CFR 51.308(g)(1), we suggest referencing the discussion in Section 3.0 that Mississippi has no reasonable progress sources, or instead, moving Section 3.3 up to Section 2.0 and referencing it in Section 3.0 which addresses 40 CFR 51.308(g)(2).
- b. S.2.4, p.3: Consider adding a conclusory statement at the end of Section 2.4 that acknowledges that these requirements were implemented on the timeline in the regulation.
- c. S.2.7, p.5: We suggest to add a statement at the end of Section 2.7 expanding the implementation schedule for the nonroad standards to include that the reduction in fuel sulfur levels applied to most nonroad diesel fuel in 2010 and applied to fuel used in locomotive and marine vessels in 2012.
- d. S.2.8, p.5: We suggest updating the timelines for the maximum achievable control technology standards (MACT) in Section 2.8 and including a statement that indicates any additional emissions reductions from these updated standards may provide further assurance that Breton achieves its reasonable progress goals (RPGs). We will work with you to address this comment.
- e. S.2.11: We suggest adding to the explanatory statement to Section 2.11 that any emissions reductions from the "New Control Strategies" which were not relied upon by Mississippi in its regional haze SIP provide further assurance that Breton achieves its RPGs.
- f. S. 2.11.1: Consider including a statement that EPA updated certain emissions limits for new power plants under EPA's Mercury Air Toxics Standards Rule April 24, 2013. We can assist you with this update.
- g. S. 2.11.2., p.8: We suggest to update the status of EPA's final Data Requirements Rule in the second to last sentence of Section 2.11.2. We can assist you with this update.

3. Section 3.1:

- a. Consider clarifying that the first sentence regarding the State's regional haze SIP and its sulfates analysis applies to all the VISTAS Class I areas.
- b. Consider noting that sulfates continue to also be the major component of visibility impairment at the Breton Class I area as shown in Figures 2 and 3 of the progress report in Section 7.0.
- c. "Figure 2" described in Section 3.1 appears to be missing from this progress report.
- d. Please include the source of the data in Figure 1 and we suggest to include a brief statement summarizing what "Figure 1" shows.

- e. Consider modifying the phrasing that emissions reductions were not needed for Breton's control strategy to reflect that Mississippi's sources were not identified as meeting Louisiana's screening criteria for sources to evaluate for potential reasonable progress control.
- 4. **Section 3.3:** Consider to remove "AOI" or reference the State's regional haze SIP or explain the term.
- 5. **Section 10.0:** Consider identifying that the RPGs referenced in the second to last sentence refer to the Breton Class I area.
- 6. **Tables and Figures:**
 - a. In Tables 3 and 4, consider either changing "EIS" to "NEI" for clarity and consistent with terminology describing the NEI elsewhere in the progress report or noting that these terms are interchangeable.
 - b. In Table 1, 4th column, 1st row – we suggest to update the term "VITAS".
 - c. In Table 4, fourth row down, please check if "2011" is meant to read "2014".
 - d. In Table 5, consider including a footnote to explain that the "Required Control Date" for Mississippi Phosphate Corporation is five years after the effective date of EPA's final limited approval of the State's regional haze SIP (July 27, 2012), which is July 27, 2017.
 - e. In Table 7, we suggest including the source of the 2002 data in Table 7 similar to how it is addressed for Table 10.
 - f. In Figures 2 and 3, please check if "Vision" is meant to read "Visibility".

Michele

Michele Notarianni
U.S. EPA Region 4
404-562-9031
Notarianni.michele@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 5/22/2018 3:45:34 PM
To: Frizzell, Gretchen [Frizzell.Gretchen@epa.gov]
Subject: RE: South Carolina Draft Language - NOx Standards for Boilers

Thanks Gretchen. I think I need to call you at 4 PM. I am in an off-site meeting with intermittent email access.

Thanks,
Brad

From: Frizzell, Gretchen
Sent: Tuesday, May 22, 2018 9:50 AM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: RE: South Carolina Draft Language - NOx Standards for Boilers

Deliberative Process / Ex. 5

Gretchen M. Frizzell · Attorney-Adviser
Office of Regional Counsel · EPA Region 4
404.562.8089 · frizzell.gretchen@epa.gov

From: Akers, Brad
Sent: Friday, May 18, 2018 4:37 PM
To: Frizzell, Gretchen <Frizzell.Gretchen@epa.gov>
Subject: RE: South Carolina Draft Language - NOx Standards for Boilers

Thanks, Gretchen. I'll be out of here by then, just wanted to let you know I was forwarding the papers for the SC NOx rule revisions and talk them over a little. We can catch up next week.

Thanks,
Brad

From: Frizzell, Gretchen
Sent: Friday, May 18, 2018 4:15 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: RE: South Carolina Draft Language - NOx Standards for Boilers

Hey, just saw you called. Can call you back in like an hour if you'll still be around!

Gretchen M. Frizzell · Attorney-Adviser
Office of Regional Counsel · EPA Region 4
404.562.8089 · frizzell.gretchen@epa.gov

From: Akers, Brad
Sent: Friday, May 18, 2018 12:36 PM
To: Frizzell, Gretchen <Frizzell.Gretchen@epa.gov>
Subject: FW: South Carolina Draft Language - NOx Standards for Boilers

FYI, Gretchen. I will give you updates as I receive them. Here is Dave McNeal's review of the portion of South Carolina's draft supplemental explanation regarding the NOx limit for fluidized bed combustion boilers.

I am currently drafting the issue paper and hope to send it out for comment/review soon.

Thanks,
Brad

From: McNeal, Dave
Sent: Friday, May 18, 2018 12:05 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Cc: Huey, Joel <Huey.Joel@epa.gov>; Dubose, Dick <DuBose.Dick@epa.gov>
Subject: RE: South Carolina Draft Language - NOx Standards for Boilers

Brad,

Deliberative Process / Ex. 5

David McNeal
EPA Region 4
404-562-9102

From: Akers, Brad
Sent: Friday, May 18, 2018 10:04 AM
To: McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Huey, Joel <Huey.Joel@epa.gov>
Subject: South Carolina Draft Language - NOx Standards for Boilers

Hi Dave,

Deliberative Process / Ex. 5

Let me know if you have any questions.

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 12/10/2018 2:13:47 PM
To: Benjamin, Lynorae [benjamin.lynorae@epa.gov]
CC: Bradley, Twunjala [Bradley.Twunjala@epa.gov]
Subject: SC CAIR/NOx SIP Call Comment Letter

Hi Lynorae,

Deliberative Process / Ex. 5

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 3/23/2018 10:32:34 AM
To: Huey, Joel [Huey.Joel@epa.gov]
Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Deliberative Process / Ex. 5

Thanks,
Brad

From: Huey, Joel
Sent: Thursday, March 22, 2018 2:43 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Deliberative Process / Ex. 5

Joel

From: Akers, Brad
Sent: Thursday, March 22, 2018 2:37 PM
To: Huey, Joel <Huey.Joel@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>; Spann, Jane <Spann.Jane@epa.gov>; Frizzell, Gretchen <Frizzell.Gretchen@epa.gov>
Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Hi Joel,

Deliberative Process / Ex. 5

Thanks,
Brad

From: Akers, Brad
Sent: Thursday, March 15, 2018 1:51 PM
To: Huey, Joel <Huey.Joel@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>; Spann, Jane <Spann.Jane@epa.gov>; Frizzell, Gretchen <Frizzell.Gretchen@epa.gov>
Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Hi Joel,

Deliberative Process / Ex. 5

Brad

From: Huey, Joel

Sent: Thursday, March 15, 2018 1:39 PM

To: Akers, Brad <Akers.Brad@epa.gov>

Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>; Spann, Jane <Spann.Jane@epa.gov>

Subject: RE: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Brad,

Deliberative Process / Ex. 5

Joel

From: Akers, Brad

Sent: Thursday, March 1, 2018 1:30 PM

To: Huey, Joel <Huey.Joel@epa.gov>; Spann, Jane <Spann.Jane@epa.gov>

Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>

Subject: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Hello Joel and Jane,

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 3/7/2018 7:49:39 PM
To: Frizzell, Gretchen [Frizzell.Gretchen@epa.gov]
CC: Huey, Joel [Huey.Joel@epa.gov]; Spann, Jane [Spann.Jane@epa.gov]; Benjamin, Lynorae [benjamin.lynorae@epa.gov]
Subject: FW: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision
Attachments: 20180227_SandS_Std.5.2.docx; R61-62_5_Std5_2_#79-20170825.pdf; 62.5 - Std 5.2-2017.pdf

Hi Gretchen,

Deliberative Process / Ex. 5

Thanks,
Brad

From: Akers, Brad
Sent: Thursday, March 01, 2018 1:30 PM
To: Huey, Joel <Huey.Joel@epa.gov>; Spann, Jane <Spann.Jane@epa.gov>
Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>
Subject: COMMENTS REQUESTED: Pre-Draft for South Carolina NOx Rule Revision

Hello Joel and Jane,

Deliberative Process / Ex. 5

Thanks,

Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 5/18/2018 8:37:28 PM
To: Frizzell, Gretchen [Frizzell.Gretchen@epa.gov]
Subject: RE: South Carolina Draft Language - NOx Standards for Boilers

Thanks, Gretchen. I'll be out of here by then, just wanted to let you know I was forwarding the papers for the SC NOx rule revisions and talk them over a little. We can catch up next week.

Thanks,
Brad

From: Frizzell, Gretchen
Sent: Friday, May 18, 2018 4:15 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: RE: South Carolina Draft Language - NOx Standards for Boilers

Hey, just saw you called. Can call you back in like an hour if you'll still be around!

Gretchen M. Frizzell · Attorney-Adviser
Office of Regional Counsel · EPA Region 4
404.562.8089 · frizzell.gretchen@epa.gov

From: Akers, Brad
Sent: Friday, May 18, 2018 12:36 PM
To: Frizzell, Gretchen <Frizzell.Gretchen@epa.gov>
Subject: FW: South Carolina Draft Language - NOx Standards for Boilers

Deliberative Process / Ex. 5

Thanks,
Brad

From: McNeal, Dave
Sent: Friday, May 18, 2018 12:05 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Cc: Huey, Joel <Huey.Joel@epa.gov>; Dubose, Dick <DuBose.Dick@epa.gov>
Subject: RE: South Carolina Draft Language - NOx Standards for Boilers

Brad,

Deliberative Process / Ex. 5

David McNeal
EPA Region 4

404-562-9102

From: Akers, Brad
Sent: Friday, May 18, 2018 10:04 AM
To: McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Huey, Joel <Huey.Joel@epa.gov>
Subject: South Carolina Draft Language - NOx Standards for Boilers

Hi Dave,

Deliberative Process / Ex. 5

Let me know if you have any questions.

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 5/18/2018 4:36:19 PM
To: Frizzell, Gretchen [Frizzell.Gretchen@epa.gov]
Subject: FW: South Carolina Draft Language - NOx Standards for Boilers

FYI, Gretchen. I will give you updates as I receive them. Here is Dave McNeal's review of the portion of South Carolina's draft supplemental explanation regarding the NOx limit for fluidized bed combustion boilers.

I am currently drafting the issue paper and hope to send it out for comment/review soon.

Thanks,
Brad

From: McNeal, Dave
Sent: Friday, May 18, 2018 12:05 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Cc: Huey, Joel <Huey.Joel@epa.gov>; Dubose, Dick <DuBose.Dick@epa.gov>
Subject: RE: South Carolina Draft Language - NOx Standards for Boilers

Brad,

Deliberative Process / Ex. 5

David McNeal
EPA Region 4
404-562-9102

From: Akers, Brad
Sent: Friday, May 18, 2018 10:04 AM
To: McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Huey, Joel <Huey.Joel@epa.gov>
Subject: South Carolina Draft Language - NOx Standards for Boilers

Hi Dave,

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Let me know if you have any questions.

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 2/1/2018 1:19:45 PM
To: Wall, Mary Peyton [wallmp@dhec.sc.gov]
Subject: RE: CAIR Regulation/NOx SIP Call revision

Hi Mary Peyton,

I'm checking the morning. It might be good to look ahead to the next week to see if there is some additional availability, and otherwise, we could make it the primary focus of the monthly call. We'll see if 2/8 in the morning works first.

Thanks,
Brad

From: Wall, Mary Peyton [mailto:wallmp@dhec.sc.gov]
Sent: Thursday, February 01, 2018 8:13 AM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: RE: CAIR Regulation/NOx SIP Call revision

After talking with Marie, if there's any way to move the call to the morning, that would be great. If I misspoke, I truly apologize, but the morning on the 8th is better for all of us rather than the afternoon.

Thanks,
Mary Peyton

Mary Peyton D. Wall
Section Manager, Air Regulation and SIP Management
S.C. Dept. of Health & Environmental Control
Office: (803) 898-4064
Fax: (803) 898-4117
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



From: Akers, Brad [mailto:Akers.Brad@epa.gov]
Sent: Wednesday, January 31, 2018 3:45 PM
To: Wall, Mary Peyton <wallmp@dhec.sc.gov>
Cc: Brown, Marie F. <brownmf@dhec.sc.gov>; Brown, Robbie <brownrj@dhec.sc.gov>; benjamin.lynorae@epa.gov
Subject: RE: CAIR Regulation/NOx SIP Call revision

Hi Mary Peyton,

I wanted to follow up to let you know we are on people's calendars for next Thursday, 2/8 from 3 – 4 PM to discuss the draft SIP revisions. I will forward our draft comments at least a couple of days prior to the call. We will be using the following conference line information. However, please let me know how many of your staff would need to call in remotely (or from a regional office) so that I know how many of the available 6 lines will be tied up. If needed, we have another conference line we can use.

Personal Phone / Ex. 6

Thanks,
Brad

From: Wall, Mary Peyton [<mailto:wallmp@dhec.sc.gov>]
Sent: Wednesday, January 10, 2018 2:17 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Cc: Brown, Marie F. <brownmf@dhec.sc.gov>; Brown, Robbie <brownrj@dhec.sc.gov>
Subject: CAIR Regulation/NOx SIP Call revision

Brad-

Please see the attached draft documents for our revision to the CAIR regulation and the 110(l) Non-Interference Demonstration for large non-EGU orphans that remain in the NOx SIP Call. Please let me know if you have any questions. I would like to set up a phone call to discuss it at EPA's earliest convenience.

Thanks,
Mary Peyton

Mary Peyton D. Wall
Section Manager, Air Regulation and SIP Management
S.C. Dept. of Health & Environmental Control
Office: (803) 898-4064
Fax: (803) 898-4117
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 7/25/2018 7:24:05 PM
To: Sanchez, Madolyn [Sanchez.Madolyn@epa.gov]
Subject: RE: SC Monthly Call Action Item - Call for CAIR Repeal/Readoption of NOx SIP Call

Hi Madolyn,

For the transport group, staff includes the following:

- R4: Twunjala, Steve, Ashten (time being), you, Eric
- CAMD: David Lifland, Beth Murray, Edgar Mercado
- OGC: Stephanie Hogan

Thanks,
Brad

From: Benjamin, Lynorae
Sent: Wednesday, July 25, 2018 12:37 PM
To: Akers, Brad <Akers.Brad@epa.gov>; Sanchez, Madolyn <Sanchez.Madolyn@epa.gov>
Subject: RE: SC Monthly Call Action Item - Call for CAIR Repeal/Readoption of NOx SIP Call

Perfect... thanks.

From: Akers, Brad
Sent: Wednesday, July 25, 2018 12:33 PM
To: Benjamin, Lynorae <benjamin.lynorae@epa.gov>; Sanchez, Madolyn <Sanchez.Madolyn@epa.gov>
Subject: RE: SC Monthly Call Action Item - Call for CAIR Repeal/Readoption of NOx SIP Call

Deliberative Process / Ex. 5

Thanks,
Brad

From: Benjamin, Lynorae
Sent: Wednesday, July 25, 2018 12:25 PM
To: Akers, Brad <Akers.Brad@epa.gov>; Sanchez, Madolyn <Sanchez.Madolyn@epa.gov>
Subject: RE: SC Monthly Call Action Item - Call for CAIR Repeal/Readoption of NOx SIP Call

Hi Brad,

Deliberative Process / Ex. 5

I hope your day is going well.

Lynorae

From: Akers, Brad

Sent: Wednesday, July 25, 2018 12:15 PM

To: Sanchez, Madolyn <Sanchez.Madolyn@epa.gov>

Cc: Benjamin, Lynorae <benjamin.lynorae@epa.gov>

Subject: SC Monthly Call Action Item - Call for CAIR Repeal/Readoption of NOx SIP Call

Hi Madolyn,

Deliberative Process / Ex. 5

Thanks,
Brad

D. Brad Akers | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.9089 | akers.brad@epa.gov

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 1/31/2018 8:44:41 PM
To: Wall, Mary Peyton [wallmp@dhec.sc.gov]
CC: Brown, Marie F. [brownmf@dhec.sc.gov]; Brown, Robbie [brownrj@dhec.sc.gov]; Benjamin, Lynorae [benjamin.lynorae@epa.gov]
Subject: RE: CAIR Regulation/NOx SIP Call revision

Hi Mary Peyton,

I wanted to follow up to let you know we are on people's calendars for next Thursday, 2/8 from 3 – 4 PM to discuss the draft SIP revisions. I will forward our draft comments at least a couple of days prior to the call. We will be using the following conference line information. However, please let me know how many of your staff would need to call in remotely (or from a regional office) so that I know how many of the available 6 lines will be tied up. If needed, we have another conference line we can use.

Personal Phone / Ex. 6

Thanks,
Brad

From: Wall, Mary Peyton [mailto:wallmp@dhec.sc.gov]
Sent: Wednesday, January 10, 2018 2:17 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Cc: Brown, Marie F. <brownmf@dhec.sc.gov>; Brown, Robbie <brownrj@dhec.sc.gov>
Subject: CAIR Regulation/NOx SIP Call revision

Brad-

Please see the attached draft documents for our revision to the CAIR regulation and the 110(l) Non-Interference Demonstration for large non-EGU orphans that remain in the NOx SIP Call. Please let me know if you have any questions. I would like to set up a phone call to discuss it at EPA's earliest convenience.

Thanks,
Mary Peyton

Mary Peyton D. Wall
Section Manager, Air Regulation and SIP Management
S.C. Dept. of Health & Environmental Control
Office: (803) 898-4064
Fax: (803) 898-4117
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 11/7/2018 9:09:34 PM
To: Duff, Melissa K (EEC) [melissa.duff@ky.gov]
CC: Poff, Leslie [LeslieM.Poff@ky.gov]
Subject: RE: Before tomorrow's discussion

Thanks Melissa. We appreciate your flexibility. We will tentatively set a call for 4 PM. We will use Conference Line/Code / Ex. 6 as the number (access code Conference Line/Code / Ex. 6). If we need to cancel, we will let you know by mid-day.

Additionally, HQ indicated to us that the file/link is wrong on the website, and they are correcting it. We will let you know as soon as we have the updated file.

Thanks,
Brad

From: Duff, Melissa K (EEC) <melissa.duff@ky.gov>
Sent: Wednesday, November 7, 2018 8:18 AM
To: Akers, Brad <Akers.Brad@epa.gov>
Cc: Poff, Leslie <LeslieM.Poff@ky.gov>
Subject: RE: Before tomorrow's discussion

I only have availability at 4 pm tomorrow.

Melissa Duff
502-782-6597
Melissa.Duff@ky.gov

From: Akers, Brad [<mailto:Akers.Brad@epa.gov>]
Sent: Tuesday, November 06, 2018 4:38 PM
To: Duff, Melissa K (EEC) <melissa.duff@ky.gov>
Cc: Poff, Leslie M (EEC) <LeslieM.Poff@ky.gov>
Subject: RE: Before tomorrow's discussion

Hi Melissa,

I have officially cancelled/postponed tomorrow morning's call. We know this is pressing, but we want to be able to answer your question on the data first, and to have the right folks on the call. Again, please let us know if you have any availability for Thursday. We **might** be able to work on something for Friday, but I will have to cross that bridge if Thursday cannot work.

Thanks,
Brad

From: Akers, Brad
Sent: Tuesday, November 6, 2018 4:28 PM
To: 'Duff, Melissa K (EEC)' <melissa.duff@ky.gov>
Cc: Poff, Leslie <LeslieM.Poff@ky.gov>
Subject: RE: Before tomorrow's discussion

Hi Leslie,

We are looking into your question and hope to be able to get you an answer ASAP. Additionally, we may need to cancel/reschedule the 9 AM call. We are really sorry for the inconvenience there, but staff that we believe is critical has been out for the past two days, and we're not sure any longer if we would have the right folks for the call. Are you all available Thursday at the times we listed (9 AM and 4 PM)?

Thanks,
Brad

From: Duff, Melissa K (EEC) <melissa.duff@ky.gov>
Sent: Tuesday, November 6, 2018 2:32 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Cc: Poff, Leslie <LeslieM.Poff@ky.gov>
Subject: Before tomorrow's discussion
Importance: High

Brad – can someone please let me know whether or not the correct file is listed on the EPA website prior to (or during) our call tomorrow morning? The October 19th memo lists two files available (bottom of page 4) “to assist states with the recommended analyses.” One is the data file containing ozone design values for individual monitoring sites, which is at the listed web address in the memo. However, the second one is supposed to be a data file that contains state-level annual NOx & VOC emissions from anthropogenic sources with a breakout by major source category, for years 2011 through 2017 and for 2023. The associated file on the website does not contain any breakout by major source category – only state-level totals for the years listed, which means it isn't helpful.

Can you please check or find out what that second file is supposed to be? I've attached the file and here is the link:
<https://www.epa.gov/airmarkets/memo-and-supplemental-information-regarding-interstate-transport-sips-2015-ozone-naaqs>

Thanks.

Melissa Duff

Director, Kentucky Division for Air Quality
300 Sower Boulevard
Frankfort, KY 40601

502-782-6597
Melissa.Duff@ky.gov
<http://air.ky.gov>

Message

From: Akers, Brad [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=950FA7E55CDB4B5FB19C3DC51D2CE065-AKERS, DAVI]
Sent: 3/16/2018 3:55:13 PM
To: Wall, Mary Peyton [wallmp@dhec.sc.gov]
Subject: RE: Agenda

Thanks Mary Peyton! Here's the updated conference line information.

Conference line:
Code:

From: Wall, Mary Peyton [mailto:wallmp@dhec.sc.gov]
Sent: Friday, March 16, 2018 10:17 AM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: Agenda

Removed the TRI topic. We've got our revised CAIR/NOx SIP call package in review with our General Counsel. I think we'd like to keep it on the agenda, but won't have time to get it to you for full review.

Mary Peyton D. Wall
Section Manager, Air Regulation and SIP Management
S.C. Dept. of Health & Environmental Control
Office: (803) 898-4064
Fax: (803) 898-4117
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



Message

From: Wall, Mary Peyton [wallmp@dhec.sc.gov]
Sent: 3/19/2018 5:04:49 PM
To: Akers, Brad [Akers.Brad@epa.gov]
Subject: RE: Agenda

We apparently have GoToMeeting. Setting one up now. Will forward the info as soon as I get it.

Mary Peyton D. Wall
Section Manager, Air Regulation and SIP Management
S.C. Dept. of Health & Environmental Control
Office: (803) 898-4064
Fax: (803) 898-4117
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



From: Akers, Brad [mailto:Akers.Brad@epa.gov]
Sent: Friday, March 16, 2018 11:55 AM
To: Wall, Mary Peyton <wallmp@dhec.sc.gov>
Subject: RE: Agenda

Thanks Mary Peyton! Here's the updated conference line information.

Conference line: **Conference Line/Code / Ex. 6**
Code: **Conference Line/Code / Ex. 6**

From: Wall, Mary Peyton [mailto:wallmp@dhec.sc.gov]
Sent: Friday, March 16, 2018 10:17 AM
To: Akers, Brad <Akers.Brad@epa.gov>
Subject: Agenda

Removed the TRI topic. We've got our revised CAIR/NOx SIP call package in review with our General Counsel. I think we'd like to keep it on the agenda, but won't have time to get it to you for full review.

Mary Peyton D. Wall
Section Manager, Air Regulation and SIP Management
S.C. Dept. of Health & Environmental Control
Office: (803) 898-4064
Fax: (803) 898-4117
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



Message

From: Wall, Mary Peyton [wallmp@dhec.sc.gov]
Sent: 2/1/2018 1:13:05 PM
To: Akers, Brad [Akers.Brad@epa.gov]
Subject: RE: CAIR Regulation/NOx SIP Call revision

After talking with Marie, if there's any way to move the call to the morning, that would be great. If I misspoke, I truly apologize, but the morning on the 8th is better for all of us rather than the afternoon.

Thanks,
Mary Peyton

Mary Peyton D. Wall
Section Manager, Air Regulation and SIP Management
S.C. Dept. of Health & Environmental Control
Office: (803) 898-4064
Fax: (803) 898-4117
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



From: Akers, Brad [mailto:Akers.Brad@epa.gov]
Sent: Wednesday, January 31, 2018 3:45 PM
To: Wall, Mary Peyton <wallmp@dhec.sc.gov>
Cc: Brown, Marie F. <brownmf@dhec.sc.gov>; Brown, Robbie <brownrj@dhec.sc.gov>; benjamin.lynoriae@epa.gov
Subject: RE: CAIR Regulation/NOx SIP Call revision

Hi Mary Peyton,

I wanted to follow up to let you know we are on people's calendars for next Thursday, 2/8 from 3 – 4 PM to discuss the draft SIP revisions. I will forward our draft comments at least a couple of days prior to the call. We will be using the following conference line information. However, please let me know how many of your staff would need to call in remotely (or from a regional office) so that I know how many of the available 6 lines will be tied up. If needed, we have another conference line we can use.

Conference Line: Conference Line/Code / Ex. 6 access code Conference Line/Code / Ex. 6

Thanks,
Brad

From: Wall, Mary Peyton [mailto:wallmp@dhec.sc.gov]
Sent: Wednesday, January 10, 2018 2:17 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Cc: Brown, Marie F. <brownmf@dhec.sc.gov>; Brown, Robbie <brownrj@dhec.sc.gov>
Subject: CAIR Regulation/NOx SIP Call revision

Brad-
Please see the attached draft documents for our revision to the CAIR regulation and the 110(l) Non-Interference Demonstration for large non-EGU orphans that remain in the NOx SIP Call. Please let me know if you have any questions. I would like to set up a phone call to discuss it at EPA's earliest convenience.

Thanks,
Mary Peyton

Mary Peyton D. Wall
Section Manager, Air Regulation and SIP Management
S.C. Dept. of Health & Environmental Control
Office: (803) 898-4064
Fax: (803) 898-4117
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



Message

From: Wall, Mary Peyton [wallmp@dhec.sc.gov]
Sent: 1/31/2018 8:49:53 PM
To: Akers, Brad [Akers.Brad@epa.gov]
CC: Brown, Marie F. [brownmf@dhec.sc.gov]; Brown, Robbie [brownrj@dhec.sc.gov]; Benjamin, Lynorae [benjamin.lynorae@epa.gov]
Subject: RE: CAIR Regulation/NOx SIP Call revision

Brad-

We would use one line from our office and one remote (I'll need to call in from home).

From: Akers, Brad [mailto:Akers.Brad@epa.gov]
Sent: Wednesday, January 31, 2018 3:45 PM
To: Wall, Mary Peyton
Cc: Brown, Marie F.; Brown, Robbie; benjamin.lynorae@epa.gov
Subject: RE: CAIR Regulation/NOx SIP Call revision

Hi Mary Peyton,

I wanted to follow up to let you know we are on people's calendars for next Thursday, 2/8 from 3 – 4 PM to discuss the draft SIP revisions. I will forward our draft comments at least a couple of days prior to the call. We will be using the following conference line information. However, please let me know how many of your staff would need to call in remotely (or from a regional office) so that I know how many of the available 6 lines will be tied up. If needed, we have another conference line we can use.

Conference Line Conference Line/Code / Ex. 6 access code Conference Line/Code / Ex. 6

Thanks,
Brad

From: Wall, Mary Peyton [mailto:wallmp@dhec.sc.gov]
Sent: Wednesday, January 10, 2018 2:17 PM
To: Akers, Brad <Akers.Brad@epa.gov>
Cc: Brown, Marie F. <brownmf@dhec.sc.gov>; Brown, Robbie <brownrj@dhec.sc.gov>
Subject: CAIR Regulation/NOx SIP Call revision

Brad-

Please see the attached draft documents for our revision to the CAIR regulation and the 110(I) Non-Interference Demonstration for large non-EGU orphans that remain in the NOx SIP Call. Please let me know if you have any questions. I would like to set up a phone call to discuss it at EPA's earliest convenience.

Thanks,
Mary Peyton

Mary Peyton D. Wall
Section Manager, Air Regulation and SIP Management
S.C. Dept. of Health & Environmental Control
Office: (803) 898-4064
Fax: (803) 898-4117
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



Message

From: Bailey, Ashten [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AA529110E34B44F09F4D0344A27C9596-BAILEY, ASH]
Sent: 5/24/2018 1:07:21 PM
To: Murray, Beth [Murray.Beth@epa.gov]; Lifland, David [Lifland.David@epa.gov]; 'Mercado, Edgar' [mercado.edgar@epa.gov]
CC: Bradley, Twunjala [Bradley.Twunjala@epa.gov]; Scofield, Steven [Scofield.Steve@epa.gov]; Febres, Andres [febres-martinez.andres@epa.gov]; Bailey, Ashten [Bailey.Ashten@epa.gov]
Subject: FW: Revisions to NOX SIP Call Rules
Importance: High

Deliberative Process / Ex. 5

Ashten Bailey
Environmental Protection Specialist | U.S. EPA | R4 | APTMD | APIB | ARMS
p: (404) 562-9164

From: Febres, Andres
Sent: Thursday, May 24, 2018 8:55 AM
To: Bailey, Ashten <Bailey.Ashten@epa.gov>
Subject: FW: Revisions to NOX SIP Call Rules

Deliberative Process / Ex. 5

Andres Febres | Environmental Engineer | U.S. Environmental Protection Agency
Region 4 | Air, Pesticides & Toxics Management Division | Air Regulatory Management Section

61 Forsyth St. SW | Atlanta, GA 30303
404.562.8966 | febres-martinez.andres@epa.gov

From: Travis Blake [<mailto:Travis.Blake@tn.gov>]
Sent: Thursday, May 24, 2018 8:38 AM
To: Febres, Andres <febres-martinez.andres@epa.gov>
Cc: Paul LaRock <Paul.LaRock@tn.gov>; James Johnston <james.johnston@tn.gov>
Subject: Revisions to NOX SIP Call Rules

While we're on the phone with CAMD, I would like to discuss our reporting requirements in 1200-03-27-12(7)(b)4 (see below):

For the control period beginning in 2017 and each control period thereafter, the Responsible Official of an affected facility shall submit the following report no later than the compliance deadline:

- (i) Affected facility name and address;
- (ii) Responsible Official name and title;
- (iii) Total number of allowances allocated to the affected facility for the control period;
- (iv) The following information for each affected unit:
 - (I) Total NO_x emissions (in tons) for the control period; and
 - (II) Heat input for the control period.
- (v) A signed statement by the Responsible Official certifying the truth, accuracy, and completeness of the information provided in the report.

When we wrote the original language, we didn't think that reporting to CAMD was going to continue, so we added a requirement to submit a report to the state. Since all of the affected units are reporting directly to CAMD, I would propose to remove this language. I believe that the federal reporting requirements in 1200-03-27-12(11)(a) (monitor and report in accordance with Part 75) are the only reporting requirements that we need.



Travis J. Blake | TDEC Environmental Consultant 3
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue, Nashville, TN 37243
p. (615) 532-0617
travis.blake@tn.gov
tn.gov/environment

We value your opinion. Please take a few minutes to complete our [customer satisfaction survey](#).

Message

From: Bailey, Ashten [Bailey.Ashten@epa.gov]
Sent: 9/14/2018 12:30:22 PM
To: Nowell, Valerie [Nowell.Valerie@epa.gov]
CC: Benjamin, Lynorae [benjamin.lynorae@epa.gov]; Bailey, Ashten [Bailey.Ashten@epa.gov]
Subject: Flexiplace:signing on

Good morning Valerie,

Deliberative Process / Ex. 5

I hope your day has started off well,

Ashten